

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Chapter 11</b>
	§	
<b>FIELDWOOD ENERGY LLC, <i>et al.</i>,</b>	§	<b>Case No. 20-33948 (MI)</b>
	§	
<b>Debtors.<sup>1</sup></b>	§	<b>(Jointly Administered)</b>
	§	

**DEBTORS' WITNESS AND EXHIBIT LIST  
FOR HEARING ON JULY 9, 2021**

Fieldwood Energy LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), file this witness and exhibit list (the “**Witness and Exhibit List**”) for the hearing scheduled for **July 9, 2021 at 10:00 a.m. (Prevailing Central Time)** (the “**Hearing**”):

**WITNESSES**

The Debtors may call any of the following witnesses at the Hearing:

1. Michael T. Dane, Senior Vice President and Chief Financial Officer, Fieldwood Energy LLC;
2. Nathan Vaughn, Deepwater Land Advisor, Fieldwood Energy LLC;
3. Any witness called or listed by any other party; and
4. Any rebuttal witnesses.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

**EXHIBITS**

The Debtors may offer into evidence any one or more of the following exhibits:

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
1.	Transcript of Hearing, February 2, 2021 (ECF No. 854)				
2.	Debtors' Notice of Bankruptcy Rule 2004 Request for Production of Documents from BP Exploration & Production Inc. (ECF No. 1387)				
3.	Debtors' Notice of Bankruptcy Rule 2004 Request for Production of Documents from Shell Offshore Inc. (ECF No. 1388)				
4.	<i>Galapagos Area Loop Subsea Production System Construction and Operating Agreement</i> , dated December 1, 2011 <i>[filed under seal]</i>				
5.	<i>Production Handling and Operating Services Agreement</i> , dated September 21, 2010 <i>[filed under seal]</i>				
6.	<i>Purchase and Sale Agreement by and between BP Exploration &amp; Production Inc. and Fieldwood Energy LLC</i> , dated May 17, 2019 <i>[filed under seal]</i>				
7.	<i>Notice for Removal of Operator for Cause</i> , Letter from Fieldwood to BP, dated May 14, 2021				
8.	<i>Fieldwood's Notice of Removal of Operator for Cause</i> , Letter from BP to Fieldwood, dated May 19, 2021				

<b>EXHIBIT NO.</b>	<b>DESCRIPTION</b>	<b>OFFERED</b>	<b>OBJECTION</b>	<b>ADMITTED</b>	<b>DATE</b>
9.	<i>Fieldwood's Notice of Removal of Operator for Cause</i> , Letter from Weil to Greenberg Traurig, dated May 21, 2021				
10.	<i>Fieldwood's Notice of Removal of Operator for Cause</i> , Letter from Greenberg Traurig to Weil, dated May 21, 2021				
11.	<i>Fieldwood's Notice of Removal of Operator for Cause</i> , Letter from Weil to Greenberg Traurig, dated May 24, 2021				
	Any exhibit designated by any other party				
	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases				
	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party				

The Debtors reserve the right to amend or supplement this Witness and Exhibit List at any time prior to the Hearing.

Dated: July 7, 2021  
Houston, Texas

Respectfully submitted,

/s/ Paul Genender

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*Attorneys for Debtors and Debtors in  
Possession*

**Certificate of Service**

I hereby certify that on July 7, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Paul Genender

Paul R. Genender